



In the District Court of Cleveland County  
State of Oklahoma

William L. Harding  
Plaintiff

vs.

Oklahoma Dept. of Correction  
Joseph Harp Furniture Factory  
Anthony Wiechuck, Alex  
Lunn, Keith Wells  
Defendant(s)

Case No. CG-2021-487  
(To be entered by Court Clerk)

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }

**FILED**

MAY 20 2021

In the office of the  
Court Clerk MARILYN WILLIAMS

Petition

Comes now the Plaintiff, William L. Harding, and alleges to the Court as follows:

1. The Plaintiff, (full name) William Lee Roy Harding, is an inmate confined in the penal facility located at (mailing address) PO Box 548  
Lexington Oklahoma 73051

2. The Plaintiff is a resident of the State of Oklahoma and has been for 9 years.

3. (a) The Defendant, (name of first defendant) Anthony Wiechuck is employed as (position and title, if any) The  
Defendant's employment address is (mailing address) 3400 MLK Ave  
OKC OKla 73111

At the time the claim(s) alleged in this complaint arose, was this Defendant acting under Color of state law? X Yes, or,      No. If answer is 'yes', briefly explain:

Anthony Wiechuck was the top fore-  
man at Joseph Harp Correction Furni-  
ture Factory and held authority over  
inmates there

3. (b) The Defendant, (name of second defendant) Alex Lunn is employed as (position and title, if any) The  
Defendant's employment address is (mailing address) 3400 MLK Ave  
OKC OKla 73111

At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? X Yes, or,      No. If your answer is 'yes', briefly explain:

Alex Lunn was a director over  
Furniture Factory at Joseph Harp Corr-

**Exhibit 1**

**Plaintiffs Petition 01**

ection Furniture Factory and has  
authority over inmates there

Note: Attach additional pages to furnish the information above on each defendant.

SEE ATT.  
PAGE 1

4. Jurisdiction: 42 USC-1981 employment  
discrimination and Equal Pay Act. State  
and Federal Question

5. Venue: Jury

6. Briefly state the facts of the case: ~~THREATENED~~ ~~DETAINED~~  
Petitioner was racially discriminated against  
by the defendants in various ways, he  
was never paid over time for any hours  
worked 40 hrs per week and he was retaliated  
against for filing complaints at the  
State & Federal Level & ultimately fired as a  
result.

7. (a) The Plaintiff alleges that the following constitutional rights, privileges or immunities have  
been violated: (List and designate each count separately).

SEE Attachment Page 1 of 4  
Statement of Claim  
pgs 4 of 4 Coe Claims

- (b) The following facts support the allegation above: (List and designate each count separately).

SEE: Equal Employment Opportunity  
Commission pages 1 of 7 - 7 of 7

8. I have filed other lawsuits in state or federal court dealing with the same facts involved in this action. X Yes, or, ~~X~~ No. If the answer is 'yes', describe each lawsuit. (Please attach additional copies of the petition(s) and/or requests for administrative relief). Chapter 7 in West Dist of Okla. Sited at same time

(a) Parties to the previous lawsuit: Okla. Dept of Corrections, Joseph Harp Furniture Factory

Plaintiff(s): Anthony Wreched, Alton Lunn, Kirk Wells,

Defendant(s): William C. Harding

(b) Name of court and case number: West District of Oklahoma

(c) Case status: X Pending  
 \_\_\_\_\_ Relief granted  
 \_\_\_\_\_ Action dismissed  
 \_\_\_\_\_ On appeal  
 \_\_\_\_\_ Other, please specify:

(d) Issues presented: Same

(e) Date of filing: Same time

(f) Date of Disposition: Open

9. I have sought informal or formal relief from the appropriate administration officials regarding the acts stated in allegation 8 of this Petition. X Yes, or, \_\_\_\_\_ No. If your answer is 'yes', briefly describe how relief was sought and the outcome of the proceedings. If your answer is 'no', briefly explain why administrative relief was not sought.

SEE ~~also~~ Exhibit "A" p 1-11  
also Exhibit "B" p 1-11 & B1/1

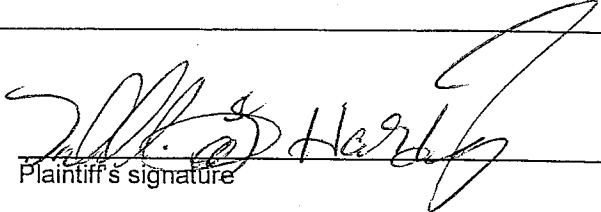
10. Relief requested: \$2,500,000, plus punitive

damages, back over time pay, back pay,  
forward pay and any other relief that  
the court may deem acceptable plus sanctions  
to ~~ensure~~ insure that this type of discrim-  
ination ceases in all of Department of Corrections

11. Have you brought any lawsuits in state or federal court within the last ten (10) years? "OCI"

☒ Yes, or, ☐ No. If your answer is 'yes', a sworn affidavit listing the litigation and the  
outcome of the litigation must be attached.

12. I am representing myself. ☒ Yes, or, ☐ No. If your answer is 'no', please explain.

  
Plaintiff's signature

P.O. Box 548  
Plaintiff's address

Lexington OH

## SWORN AFFIDAVIT

STATE OF OKLAHOMA )  
 COUNTY OF CLEVELAND )

I, William L. Harding, residing at Joseph Harp Correctional Center, P.O. Box 548, Lexington, OK 73051-0548, being of lawful age, sound mind and memory and having been duly sworn, hereby depose and state that the following facts are true and correct to the best of my knowledge and belief:

1. I William L. Harding have filed the following law suits in the last 10 years: William L
2. Harding - v - Watch Tower Bible and Tract Society of PA.
3. et al Case No. CJ-2020-559; Cleveland Co. OKla; -
4. Still pending. William L. Harding - v - Robert Causey
5. et al Case No. CIV-15-316R; Weston Dist of Oklahoma;
6. Dismissed; William L. Harding - v - Officer Stevens,
7. Joseph Harp Correctional Center Case No. CIV-15-315-R
8. West. Dist of Okla. Dismissed these are the law
9. suits; remember to the best of my knowledge
10. I do not have all of my records before me

AFFIANT FURTHER SAYETH NAUGHT.

Dated: May 4th 2021

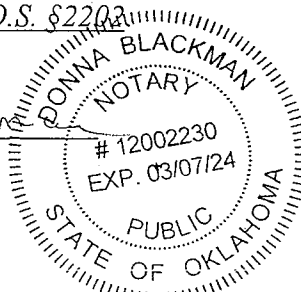
/s/ [Signature]

Signature of Affiant

Subscribed and sworn to me, the undersigned Notary Public in and for the County of Cleveland and the State of Oklahoma, by William Harding on this 4 day of May, 2021. The Affiant's identification has been verified by his Oklahoma Dept. of Corrections issued identification card which is capable of accurate determination by source whose accuracy cannot reasonably be questioned. See: 12 O.S. §2203

/s/ Donna Blackman

Notary Public



Attachment Payer

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3 c. Defendant: Keith Wells

16161 Mossat Road

Lexington OK. 73051

Color of State Law: yes

Keith Wells is a Floor Supervisor at Joseph Harp Furniture Factory and has authority over inmates.

3. d. Defendant: Oklahoma Department of Corrections:

3400 MLK Ave

OKC. OKla 73111

Color of State Law: yes

The Department of Corrections is the corporations that employs Anthony Wiechue, Alex Lunn & Keith Wells

3. e Joseph Harp Furniture Factory

16161 Mossat Road

Lexington OK. 73051

Color of Law: yes

The Joseph Harp Furniture Factory is a incorporated entity owned by Oklahoma Department of Correction

Attachment Pages

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that employs inmates by the hour and as independent contractors and issue W-1099 tax forms for tax purposes.



## Attachment Page

of 4

### Statement of Claims

No 1: racial discrimination; I was laid off and ultimately fired by Anthony Wiechec and Alex Lunn for speaking up for myself against an accusation for hobby crafting. While being African American, when others that are white did not suffer the same fate for speaking up for themselves.

No 2: Defamation; On 3-9-2020 in a production meeting Anthony Wiechec defamed & humiliated myself & my character in front of my work peers which were all white other than Alfred Poolaw, which is Native American, demeaning for several minutes with the intent to embarrass, shame & harass me in front of others while Keith Wells sat there and watched.

No 3: Retaliation: After work on



Attachment Page

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3-9-2020, at the security gate i was told by officer Jaqures that i was not to come back to work for one week that i was laid in by Anthony Wiechec. This was done in retaliation for me speaking up for myself at the production meeting. On 3-11-2020 I filed a complaint Request to Staff No 3400-12575 and later to the Attorney General and EEOC. The end result was that i was terminated on 6-15-2020 without ever returning to work.

No 4. No overtime pay: During my entire time working at Joseph Harp Furniture factory i was never paid overtime for the hours worked over 40 hrs per week as required by state and Federal laws. My time sheets will prove this claim.

## Attachment Page

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No. 5. Hostile Work environment: Anthony Wiechec instructed personal of all levels to report to him if they saw anything that they deemed to be extra work, side jobs, aka-hobby craft. Creating a hostile work environment, because he & Alex Lunn had people doing personal hobby-craft for themselves including myself the petitioner William L. Harding. Anthony Wiechec Favoritism over one nationality over another when to his advantage

No. 6. Cat Paw Theory: Anthony Wiechec, Alex Lunn & Keith Wells took under advisement and made personal decisions based off the direction of certain white personal at the Furniture factory at Joseph Harp. Allowing them to dictate whom was hired, what positions they would work & how much they were to be paid.

4/4

At one time i was elected  
 become shoppe lead man. After  
 a day or two of the announce-  
 ment, Keith Wells ask me if i  
 would allow some else to —  
 take the position, after a brief  
 discussion there was an agreement  
 made, that if i did so, my self  
 and Wade Edwards would both be  
 moved out on pay to .65<sup>th</sup> an  
 hour, which we both were with  
 in the next week or so.

Afterwards i was told by  
 other personal, that certain white  
 personal appropche Keith Wells,  
 saying a "black" floor lead was  
 not what was wanted by them  
 and others, which the majority  
 of the furniture factory is white  
 & all of the department of —  
 Correction Furniture Factory personnel  
 is white.

Respectfully,  
 [Signature]  
 [Signature]

2/6/2026 To: Equal Employment Opportunity Commission 1/9/21

1. Racial Discrimination

2. Retaliation

3. Violations of:

1. 14<sup>th</sup> Amend - Equal protection

2. 2<sup>nd</sup> Amend - Freedom of speech

3. 1<sup>st</sup> Amend

4. Defamation

5. Hostile Work environment

6. Cat Paw Theory

I William C. Harding Doc# 234-134  
 being incarcerated at Joseph Harp  
 Correction Center in Lexington Okla.  
 Being employed by Oklahoma  
 Correction Industries "Furniture Factory  
 (Please see Tax Form 1099 enclosed)

On or about March 9<sup>th</sup> 2020 in  
 a production meeting Anthony Wiechee  
 defamed my character in front of  
 my work peers all being white except  
 myself & one Native American, with  
 the intent to embarrass & slander  
 my name. Shop Supervisor Keith Wells  
 was present also, but only put his

head down & shook it as if to suggest his disagreement in what was being said & done. Yet Keith Wells refused to do anything to stop Anthony Wiechec.

I then spoke up for myself. Stating that I followed the guidelines put out by Anthony Wiechec. Anthony Wiechec stated that he would talk to me about the issue later. The rest of the work day went by with Anthony Wiechec speaking to me. When I clocked out at the end of the day Officer Jagers told me I was not to come back to work for one week, he further stated: "I did not" knew the reason why!

That day or the next I filed a request to state that went to Alex Lunn, "Copy enclosed". A week later I went back to work at that time Anthony Wiechec told me that I could not come back to work per Alex Lunn.



7  
3 of 10

Director of "OCI" OLA. Correction Industries because I filed paper work "Request to Staff" & that there was an investigation going on into my allegations against Anthony Wiechee. "Yes I was laid off because Anthony Wiechee & Alex Lunn was being investigated. I have not been allowed to return to work since.

There are at least three other white inmates that have cussed Anthony Wiechee out in front of other inmates & staff with nothing being done to them at all.

I was not only laid off, but also Anthony Wiechee took 12% of my pay. Which not only double jeopardy but is not part of the OCI policy.

I at a company meeting after I was not allowed to come back to work ~~that~~ Anthony Wiechee told all the inmate & staff employees that I was laid off because I talked back to him. "I am a man not a slave.



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4 of 6

At some point I spoke with Stephanie Mills and Matt Perry of Internal Affairs through my case Manager Debbie Mills, they stated that Anthony Wiechee was being investigated & assured me that they had nothing to do with me being not able to go back to work during their investigation.

The other subject matter has to do with a work bench that I built. Anthony Wiechee claims that it is hobby craft, which it was not. At any rate Anthony Wiechee ask me to make him 6 serving trays & a cutting board for his personal use "gifts to his grand kids he agreed to pay me one dozen apple fritters from dry light doughs. He paid the first dozen but did not pay the rest. Anthony Wiechee and some told certain inmates that

hid me in because of the  
bench. Anthony Wiechec can not ask  
me to hobby craft for him person-  
ally then punish me for the same  
thing. I believe Anthony Wiechec  
& Alex Lunn has done these  
things because a black man  
has stood up for his rights. I  
am or was the only BLACK  
Lead man in the whole Factory. I  
was at one time elected by  
Chris Blount to take his place as  
Floor lead but white Teamsters con-  
vinced Anthony Wiechec & Keith Wells  
not to allow me to have the  
position, not wanting a "BLACK MAN"  
as Shop Floor lead.

As for as the hobby craft  
Anthony Wiechec was approached by  
Teamster Joshua Ray to buy some  
of his hobby craft that he had  
built at the Furniture Factory but  
nothing at all was done to him  
which is a white.

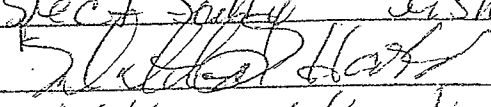
7  
6/8

In fact Anthony Wiechec gave Joshua Ray permission to build plaque for various groups in which he was compensated for by said groups. The Josh. Ray sold ~~by~~ hobby craft to one of the Furniture factory staff members with out any representations from Anthony Wiechec.

Stephanie Mills & Matt Perry interviewed some inmates that made recorded statement that will verify my claims. There are others that will do the same, but I can request this for fear of more retaliation on myself & them.

Enclosed are copies of paper work to show whom was at the production meeting on March 4<sup>th</sup> 2020. I can also give you the name of the three white inmates that cussed out Anthony Wiechec in the presence of other inmates & staff.

Please return  
Stamped SILENT  
COPY

Respectfully Submitted  
  
William L. Harding

234-1 Exhibit 1

7/7

I can not go around asking for statement because there is a chance not only of other inmates attempting evidence but also telling Anthony Wiechee what I am doing before I get thing filed, also they may be able to charge me with inciting a riot.

There are other issues about wages once Anthony Wiechee & Alex Lure had me work on personal projects that were not for the state or State Agencies they broke their agreement that the state & government meaning they should have been pay at least minimum wages according to Idaho not the 25¢ - 60¢ a hour that pay us at the Furniture Factory. They have had me do thousands of dollars worth of work for their personal homes & family members which as I know now is illegal. From serving trays, reloading table to custom Amrook lawee chairs at the states expense

Respectfully

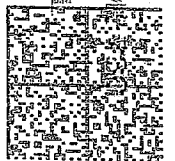
William C. Hartley

Exhibit 1 of 234-1.

OKLAHOMA CITY AREA OFFICE  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
215 DEAN A MCGEE AVENUE, SUITE 524  
OKLAHOMA CITY, OKLAHOMA 73102  
OFFICIAL BUSINESS

Exhibit A

OKLAHOMA CITY OFFICE  
31 MAR 2021 PM 4

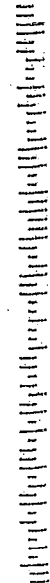


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ZIP 73102 \$000.51  
02 4W  
0000360959 MAR 15 2021

Dismissal of Motion for Rights

1/12

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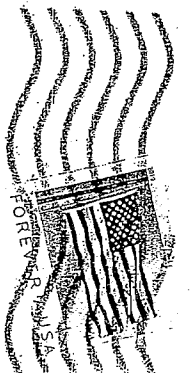
*Charge of Discrimination*

OKLAHOMA CITY AREA OFFICE  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
215 DEAN A MCGEE AVENUE, SUITE 524  
OKLAHOMA CITY, OKLAHOMA 73102  
OFFICIAL BUSINESS

*Exhibit A*

OKLAHOMA CITY OK 730

28 JAN 2021 PM 4 L



Mr. William Harding, Inmate # 234134  
P.O. Box 548 JHCC D-1-117

*2612*

Lexington, OK 73051

*Mailed From Back  
Privileged Mail*

73051-054848

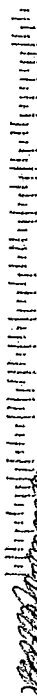


Exhibit 1

Plaintiffs Petition 20



EXHIBIT: A



OFFICE OF CIVIL RIGHTS ENFORCEMENT  
**EMPLOYMENT**  
 DISCRIMINATION COMPLAINT

You must complete this Complaint form and the accompanying Intake Questionnaire and return both documents to the address, email or fax number listed below within 180 days of the last incident of employment discrimination, harassment or retaliation. Pursuant to Oklahoma law, a copy of the Complaint will be sent to the employer. The Intake Questionnaire is for OCRE use only and will remain confidential during the investigation. Oklahoma law prohibits employers from engaging in retaliation against individuals who exercise their right to file a complaint.

GENERAL INFORMATION	
<b>YOUR INFORMATION:</b>	<b>EMPLOYER INFORMATION:</b>
Full Name: <u>William L. Harding</u>	Employer Name: <u>Department of Corrections</u> <u>Oklahoma Correction Industries</u>
Street Address: <u>SHCC-DI-117</u>	Street Address (where you actually worked): <u>Box 548</u>
City, State, Zip Code: <u>Lexington Okla 73051</u>	City, State, Zip Code: <u>Lexington Okla 73051</u>
EMPLOYMENT DISCRIMINATION BASIS	
I have been discriminated against because of my (check all that apply):	
<input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input type="checkbox"/> Pregnancy <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input checked="" type="checkbox"/> Genetic Information <input checked="" type="checkbox"/> Retaliation	
Did the discrimination include unwelcome and/or offensive harassment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Did the discrimination include sexual harassment? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date (month, day, and year) when the <u>last</u> incident of discrimination, harassment, or retaliation occurred: <u>3-18-2020</u>	
Full name and job title of each person involved in the discrimination, harassment, or retaliation: <u>Anthony Wrechee, Alex Lumen, Keith Wells</u>	

I swear and affirm that the foregoing information is true to the best of my knowledge, information, and belief.

[Signature]  
 Complainant's Signature

5-1-22-2020  
 Date

OKLAHOMA ATTORNEY GENERAL  
 OFFICE OF CIVIL RIGHT ENFORCEMENT

OKLAHOMA CITY OFFICE (Main):  
 313 N.E. 21<sup>st</sup> Street  
 Oklahoma City, Oklahoma 73105  
 Office (405) 521-3921  
 Fax (405) 521-6246

TULSA OFFICE:  
 15 W. 6<sup>th</sup> Street, Suite 1000  
 Tulsa, Oklahoma 74119  
 Office (918) 581-2342  
 Fax (918) 938-6348

EMAIL:  
 ocre.complaints@oag.ok.gov



**OFFICE OF CIVIL RIGHTS ENFORCEMENT**  
**EMPLOYMENT DISCRIMINATION INTAKE QUESTIONNAIRE**

To facilitate the evaluation and investigation of your Complaint, you must answer all of the questions below completely. You may attach additional pages if needed to complete your responses. If you do not know the answer to a question, answer by stating "not known." If a question is not applicable, please write "N/A." PLEASE PRINT CLEARLY.

THIS INTAKE QUESTIONNAIRE WILL NOT BE SENT TO THE EMPLOYER.

**I. Additional Personal Information**

Phone Numbers: Home: ( ) Work: 405 527-5593 X 8432

Cell: ( ) Email Address: VERNON.JONES@ddoc.ok.gov

Date of Birth: 12-28-64 Sex: ☒ Male ☐ Female Do You Have a Disability? ☒ Yes ☐ No

Please answer each of the next three questions. i. Are you Hispanic or Latino? ☐ Yes ☐ No

ii. What is your Race? Please choose all that apply. ☐ American Indian or Alaskan Native ☐ Asian ☐ White

☒ Black or African American ☐ Native Hawaiian or Other Pacific Islander

iii. What is your National Origin (country of origin or ancestry)? \_\_\_\_\_

Please Provide The Name Of A Person We Can Contact If We Are Unable To Reach You:

Name: VERNON JONES Relationship: CASE MANAGER II

Address: PO Box 648 City: Lexington State: OK Zip Code: 73051

Home Phone: ( ) Other Phone: 405 527-5593 X 8432

**2. I believe that I was discriminated against by the following organization(s): (Check those that apply)**

☒ Employer ☐ Union ☐ Employment Agency ☐ Other (Please Specify) \_\_\_\_\_

**Organization Contact Information** (If the organization is an employer, provide the address where you actually worked. If you work from home, check here ☐ and provide the address of the office to which you reported.) If more than one employer is involved, attach additional sheets.

Organization Name: Oklahoma Correctional Industries, "DDOC"

Address: \_\_\_\_\_ County: Cherokee

City: Lexington State: OK Zip: 73051 Phone: ( ) \_\_\_\_\_

Type of Business: Furniture Fac Job Location if different from Org. Address: Joseph Harp Correctional Cen

Human Resources Director or Owner Name: \_\_\_\_\_ Phone: ( ) \_\_\_\_\_

Number of Employees in the Organization at All Locations: Please Check (✓) One

☐ Fewer Than 15 ☒ 15 - 100 ☐ 101 - 200 ☒ 201 - 500 ☐ More than 500

3. Your Employment Data (Complete as many items as you are able.) Are you a federal employee? ☐ Yes ☒ No

Date Hired: 8-8-17 Job Title At Hire: Hard Wood Chair Lead

Pay Rate When Hired: 30¢@hr Last or Current Pay Rate: 60¢@hr

Job Title at Time of Alleged Discrimination: Chair Lead Date Quit/Discharged: 3-9-2020

Name and Title of Immediate Supervisor: Kirish Wells

If Job Applicant, Date You Applied for Job: \_\_\_\_\_ Job Title Applied For: \_\_\_\_\_

4. What is the reason (basis) for your claim of employment discrimination?

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination, and a negative action was threatened or taken, you should check the box next to Retaliation.

☒ Race ☐ Religion ☐ Sex ☐ Pregnancy ☐ Age ☐ Disability ☐ National Origin ☒ Retaliation ☐ Color (typically a difference in skin shade within the same race). If you checked color, religion or national origin, please specify the color, religion, and/or national origin: \_\_\_\_\_

☐ Genetic Information—also check the type(s) involved: ☐ Genetic Testing ☐ Genetic Services ☐ Family medical history.

If you checked genetic information, when did the employer receive the genetic information? \_\_\_\_\_

Other reason (basis) for discrimination (Explain): \_\_\_\_\_

5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name(s) and title(s) of the person(s) who you believe discriminated against you. Please attach additional pages if needed.

(Example: 10/02/06 – Discharged by Mr. John Soto, Production Supervisor)

A. Date: 3-9-2020 Action: \_\_\_\_\_

Name and Title of Person(s) Responsible: Anthony Wrechee

B. Date: \_\_\_\_\_ Action: paid me for one week

3 12% of pay taken from my salary w/ wages

Name and Title of Person(s) Responsible: Anthony Wrechee, Industrial Coordinator

6. Why do you believe these actions were discriminatory? Please attach additional pages if needed.

please attached pages noted 1 of 7

7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title?

Please see attached pages noted 1 of 7 -  
1-7

8. Describe who was in the same situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the race, sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.

Of the persons in the same situation as you, who was treated better than you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. <u>Stacy Moraya White</u>	<u>White</u>	<u>Office Clerk</u>	<u>No Action taken</u>
B. <u>Marcus Clancy White</u>	<u>White</u>	<u>Office Clerk</u>	<u>No Action taken. See attached pages noted 1 of 7</u>

Of the persons in the same situation as you, who was treated worse than you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. <u>None</u>			
B.			

Of the persons in the same situation as you, who was treated the same as you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. <u>Odreaule Guedane <sup>Bik</sup> Cajun</u>	<u>Cajun</u>	<u>Drawer lead</u>	<u>laid in one week 12% pay taken demoted to janitor</u> <u>Mr. Guedane did not file a complaint &amp; was allowed to return to work with demotion</u>

Answer questions 9-12 only if you are claiming discrimination based on disability. If not, skip to question 13. Please tell us if you have more than one disability. Please add additional pages if needed.

9. Please check all that apply:

- ☐ Yes, I have a disability  
☐ I do not have a disability now but I did have one  
☐ No disability but the organization treats me as if I am disabled

10. What is the disability that you believe is the reason for the adverse action taken against you? Does this disability prevent or limit you from doing anything? (e.g., lifting, sleeping, breathing, walking, caring for yourself, working, etc.).

11. Do you use medications, medical equipment or anything else to lessen or eliminate the symptoms of your disability?  
☐ Yes ☐ No If "Yes," what medication, medical equipment or other assistance do you use?

12. Did you ask your employer for any changes or assistance to do your job because of your disability? ☐ Yes ☐ No

If "No," please explain why not:

If "Yes," when did you ask? How did you ask (verbally or in writing)?

Who did you ask? (Provide full name and job title of person):

Describe the changes or assistance that you asked for:

How did your employer respond to your request?

13. Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say. (Please attach additional pages if needed to complete your response)

Full Name	Job Title	Address & Phone Number	What do you believe this person will tell us?
A. Wade Edwards	"Hardwood"	Box 548 Lexington OK	that I was discriminated against. Statement enclosed
B. Alfred Godwin	"Warehouse lead"	Box 548 Lexington OK	that I did nothing wrong? WAS discriminated against.
C. Lesley Stevens	"Order Clerk"	Box 548 Lexington OK	"Not Know"
D. Rose Hanley	Office Clerk	Box 548 Lexington OK	"Not Know," See names on Exhibit A-1, color sheet for production meeting

14. What other evidence do you have (check all that apply)? ☐ Email ☐ Text Messages ☐ Notes ☐ Audio Recordings  
☐ Video Recordings ☐ Journal, Diary, or Calendar Entries ☐ Social Media Posts ☒ Other (list and describe: \_\_\_\_\_)

See attached pages 1 of 11

15. Have you filed a charge of discrimination on this matter with the EEOC or another agency? ☒ Yes ☐ No

16. If you filed a charge or complaint with another agency, provide the name of agency and the date of filing:

EEOC June 26 - 2020 mailed to

17. Have you sought help about this situation from a union or any other source? ☒ Yes ☐ No

Provide name of organization, name of person you spoke with, and date of contact. Results, if any?

See attach pages noted 1 of 11

no results

18. Have you filed a claim for unemployment benefits with the Oklahoma Employment Security Commission?

☐ Yes ☒ No

19. Have you retained your own attorney to help you with this matter? ☐ Yes ☒ No If "Yes," please give the name and contact information:

I swear that the information set forth above is true and correct to the best of my knowledge, information, and belief:

[Signature]  
Complainant's Signature

July 22 2020  
Date



EEOC Form 161 (11/2020)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: William L. Harding, #234134  
P.O. Box 548  
JHCC D-1-117  
Lexington, OK 73051

From: Oklahoma City Area Office  
215 Dean A. McGee Avenue  
Suite 524  
Oklahoma City, OK 73102



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

564-2020-01626

James E. Habas,  
Investigator

(405) 666-0367

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state) Charge of Discrimination not signed and returned.

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission  
ADRIAN MCDANIEL  
DN: c=US, o=U.S. Government, ou=Equal Employment  
Opportunity Commission, cn=ADRIAN MCDANIEL,  
0.9.2342.19200300.100.1.1=45001002824715  
Date: 2021.03.26 11:23:45 -05'00'

3-26-2021

Enclosures(s)

For: Holly Waldron Cole,  
Area Office Director

(Date Issued)

cc:

Samantha Robb  
Employee Rights  
OKLAHOMA DEPARTMENT OF CORRECTIONS  
3400 N. Martin Luther King Blvd  
Oklahoma City, OK 73111



OFFICE OF ATTORNEY GENERAL  
STATE OF OKLAHOMA

July 22, 2020

Oklahoma Department of Corrections  
PO Box 548  
Lexington, OK 73051

Re: William Harding v. Oklahoma Department of Corrections  
OCRE Complaint No. CR-20-0095-E  
EEOC Charge No. 564-2020-01526

To Whom It May Concern:

This letter constitutes notice that on July 22, 2020, the Office of Civil Rights Enforcement ("OCRE") received the enclosed **Employment Discrimination Complaint**.

We have confirmed the Complainant also filed the allegations of discrimination with the U.S. Equal Employment Opportunity Commission ("EEOC"). Since the Complainant also filed with the EEOC, we allow the EEOC to take the lead on the investigation and handle this matter. Our desire is to avoid duplicating investigative efforts and creating unnecessary additional work and expense for all parties involved. In the event the parties resolve this matter, please provide this office with a copy of the Settlement Agreement for our approval.

Please feel free to call me with any questions or concerns you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Kara I. Smith", written over a horizontal line.

Kara I. Smith  
Chief Assistant Attorney General  
Chief, Office of Civil Rights Enforcement

KIS/bnj

Enclosures: Complaint, Retaliation Notice, Conciliation Notice

cc: William Harding w/enc.



CR-20-0095-E



OFFICE OF CIVIL RIGHTS ENFORCEMENT  
**EMPLOYMENT**  
 DISCRIMINATION COMPLAINT

RECEIVED

JUL 22 2020

Oklahoma Attorney General  
 Office of Civil Rights Enforcement

You must complete this Complaint form and the accompanying Intake Questionnaire and return both documents to the address, email or fax number listed below within 180 days of the last incident of employment discrimination, harassment or retaliation. Pursuant to Oklahoma law, a copy of the Complaint will be sent to the employer. The Intake Questionnaire is for OCRE use only and will remain confidential during the investigation. Oklahoma law prohibits employers from engaging in retaliation against individuals who exercise their right to file a complaint.

GENERAL INFORMATION	
<b>YOUR INFORMATION:</b>	<b>EMPLOYER INFORMATION:</b>
Full Name: <u>William L. Harding</u>	Employer Name: <u>Department of Corrections</u> <u>Oklahoma Correctional Industries</u>
Street Address: <u>JHCC-DI-117</u>	Street Address (where you actually worked): <u>Box 548</u>
City, State, Zip Code: <u>Lexington Okla 73051</u>	City, State, Zip Code: <u>Lexington Okla 73051</u>
EMPLOYMENT DISCRIMINATION BASIS	
I have been discriminated against because of my (check all that apply):	
<input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input type="checkbox"/> Pregnancy <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input checked="" type="checkbox"/> Genetic Information <input checked="" type="checkbox"/> Retaliation	
Did the discrimination include unwelcome and/or offensive harassment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Did the discrimination include sexual harassment? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date (month, day, and year) when the <u>last</u> incident of discrimination, harassment, or retaliation occurred: <u>3-18-2020</u>	
Full name and job title of each person involved in the discrimination, harassment, or retaliation: <u>Anthony Wheeler, Alex Lunn, Keith Wells</u>	

I swear and affirm that the foregoing information is true to the best of my knowledge, information, and belief.

William L. Harding  
 Complainant's Signature

July - 22 - 2020  
 Date

OKLAHOMA ATTORNEY GENERAL  
 OFFICE OF CIVIL RIGHT ENFORCEMENT

OKLAHOMA CITY OFFICE (Main):  
 313 N.E. 21<sup>st</sup> Street  
 Oklahoma City, Oklahoma 73105  
 Office (405) 521-3921  
 Fax (405) 521-6246

TULSA OFFICE:  
 15 W. 6<sup>th</sup> Street, Suite 1000  
 Tulsa, Oklahoma 74119  
 Office (918) 581-2342  
 Fax (918) 938-6348

EMAIL:  
 ocre.complaints@oag.ok.gov

Exhibit 1

Plaintiffs Petition 29

EXHIBIT B

JHCC  
Law Library  
MAR 11 2020  
Received

Must Be Submitted Through the Law Library or Designee

Inmate/Offender Grievance Process

## REQUEST TO STAFF

TO: Alex Wynn Mr. P. H. Grew Warden FACILITY/UNIT: JHCC DATE: 3-11-20  
(NAME AND TITLE OF STAFF MEMBER) JHCC 12575I have    have not X already submitted a "Request to Staff" or grievance on this same issue.If yes, what date:    facility:    grievance #:   I affirm that I do    do not X have a grievance pending on this issue.I affirm that I do    do not X have a lawsuit of any type pending that relates in any way to this issue.If a lawsuit is pending, indicate case number and court:   This request    does X does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

**SUBJECT:** State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I was hired in for one week for building a bench at CCJ PE by Anthony W. in which he called hobby craft. Yet where Anthony W. first started working as Head of Furniture he had me make 95

(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

**ACTION REQUESTED:** State exactly how you believe your request may be handled; that is, what exactly should be done and how.

To be fully paid for items made for Anthony W. Placed in Police position of chair head, decided for all days including the rate of pay for sewing & cutting boards to be \$50 each

NAME: William L. Harding (PRINT) DOC NUMBER: 234134 UNIT & CELL NUMBER: D-1-117SIGNATURE: [Signature] WORK ASSIGNMENT: JHCC - F.F.

DO NOT WRITE BELOW THIS LINE

## DISPOSITION:

Mr. Harding, you are not allowed to return to work during the investigation of this request. The investigation is currently being handled by OIG. You will be notified of any change.

STAFF MEMBER

DATE

WARDEN'S OFFICE

Date response sent to inmate/offender: 3-19-20

1. Original to file
2. Copy to inmate/offender

MAR 12 2020

DOC 090124D (R 4/19)  
RECEIVED

Exhibit 1

Plaintiffs Petition 30

He stated serving trays for his grandchildren  
 in the holidays. He agreed to pay me 1 dozen  
 Daylight Donuts Apple fritters for each one Board  
 I made him to serving trays? 1 cutting board  
 in which he brought me in 1 dozen Apple  
 fritters from Daylight Donuts. What Anthony W. claimed  
 was hobby craft had been in the shop for over 4-  
 months prior to him saying anything about. Furthermore  
 it could not be taken to the unit to constitute  
 it as hobby craft. Anthony W. layed me in with-  
 out cause and has threatened to reduce my pay  
 by 12% or \$4 @ hour. Which if there was cause  
 it would be double jeopardy being punished  
 twice for the same alleged offense. Further-  
 more, a certain inmate attempted to sell  
 Anthony W. his hobby craft work, yet he was  
 not layed in for that so called offense. I have  
 made "built" custom hobby craft items from reload-  
 ing tables to Aurora chairs for Alex the OIC  
 headguards. It seems to be that if a hobby  
 craft for there gain it is fine. But, if a person  
 does something for themselves it is for bid  
 which violates the 14<sup>th</sup> Amendment "equal protection  
 under the law. Other than speaking up for myself  
 when being degraded by ~~Anthony~~ Anthony W. I  
 did nothing wrong. Furthermore Anthony W. would not  
 or did tell me I was laid in but had Sgt  
 Jaegers tell me on my way out the OCI gate  
 this all occurred on 3-10-20. But the bench  
 was noticed by Anthony W. during the last lock  
 down? there was no incident reports.



Must Be Submitted Through the Law Library or Designee  
Inmate/Offender Grievance Process

18

## REQUEST TO STAFF

TO: Supervisor of Alex Linnell FACILITY/UNIT: JHCC-DI-117 DATE: 3-18-20  
(NAME AND TITLE OF STAFF MEMBER) JHCC 126.10

I have ☒ have not ☐ already submitted a "Request to Staff" or grievance on same issue.  
If yes, what date: 3-18-20 facility: JHCC grievance  
I affirm that I do ☐ do not ☐ have a grievance pending on this issue.  
I affirm that I do ☐ do not ☐ have a lawsuit of any type pending that relates in any to this issue.  
If a lawsuit is pending, indicate case number and court:  
This request ☐ does ☐ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator and related to the misconduct.

**SUBJECT:** State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

On 3-18-20 I returned to work (DCI F.F.) I was informed by Anthony Wierchec that Alex Linnell said that I could not return to work because of some investigation. Keith Wells also stated that I would not be in Hardwood Chair Dept.  
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

**ACTION REQUESTED:** State exactly how you believe your request may be handled; that is, what exactly should be done and how.

To be paid 10<sup>00</sup> a day for every day off, to stay as long as in Hardwood Chair Dept to be paid 75¢ an hour, a written apology from Anthony Wierchec, 3 \$50<sup>00</sup> for each piece made for Anthony Wierchec, which is 75¢

NAME: William C. Harding (PRINT) DOC NUMBER: 234-134 UNIT & CELL NUMBER: DI-117

SIGNATURE: [Signature] WORK ASSIGNMENT: JHCC FF.

DO NOT WRITE BELOW THIS LINE

## DISPOSITION

Mr. Harding, you are not allowed to return to work during the investigation of this request.

The investigation is currently being handled by OIG. You will be notified of any change.

Alex Linnell, Acting Director 03-19-2020

STAFF MEMBER

DATE

Date response sent to inmate/offender 3-19-20

1. Original to file
2. Copy to inmate/offender

DOC 090124D 4/19)

Exhibit 1  
Plaintiffs Petition 32



If there is any violation of my civil rights, I will be on, just me. Anthony Wiechec is the person that has violated my civil rights both my 1<sup>st</sup> amend & 2<sup>nd</sup> amend, equal protect and freedom of speech. There has been at least two other incidents where office personnel has cursed or raised their voice to Anthony Wiechec and nothing was done. As stated before another inmate offered to sell hobby craft work to Anthony with nothing done. All the above was done by White inmates. When offenses were alleged against to African American inmates they were laid in for 5 days & super were taken from their checks. This is a blatant display of racial prejudice by Anthony Wiechec, which further shows to me why he has not paid me for the hobby craft work I did for him as stated in my last request & staff. Furthermore Alex Lurie has no reason to refuse my return to work to Hardwood Chair Dept. For I have designed & custom built several pieces for Alex's personal use; a reloading table that is worth at least \$2,000<sup>00</sup> us that was sold for less than \$100<sup>00</sup> us per Arrowdale Chairs in which none are on the show room floor per (Landon Langston). Anthony Wiechec has, and is, creating a hostile work environment by asking inmates to switch on each other, racial bias & padding hours, in which he did this last pay period.

I am willing to take a ~~poly~~ polygraph test to prove my case

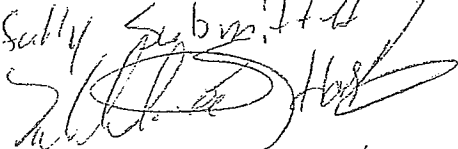
Respectfully Submitted  


Exhibit 4

SCOTT CROW  
DIRECTOR



J. KEVIN STITT  
GOVERNOR

STATE OF OKLAHOMA  
OKLAHOMA DEPARTMENT OF CORRECTIONS  
ADMINISTRATIVE REVIEW AUTHORITY

ARA 20-128

Date: APRIL 20, 2020

To: HARDING, WILLIAM #234134

Location: JHCC

From: Mark Knutson, Director's Designee *Mark Knutson*

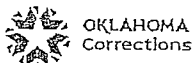
*Rec  
4-28-20  
125125  
4-30-20*

Your grievance/correspondence was filed improperly for the following reason(s):

X	1. No reviewing authority response to the grievance.
	2. No informal action, Request to Staff response included.
	3. Out of time from date of alleged incident until filing Request to Staff.
	4. Out of time from date of response to Request to Staff until filing the grievance with the reviewing authority.
	5. Received out of time from date of the reviewing authority's response.
	6. You cannot appeal a non-response. See OP-090124 section V.B.1.b.(8) (Request to Staff) or V.I.C.4. (grievance).
	7. Inmate on grievance restriction and/or proper documentation not included. See OP-090124, section X.B.2.a.
	8. Must be legibly written in blue or black ink. No pencil or other color of ink is allowed. No doodling or writing in margins.
	9. Attachments to the grievance/appeal (no additional pages allowed except affidavit if required).
	10. Not an issue grievable to Oklahoma Department of Corrections (Private prison property, misconduct, litigation pending, not within/under the authority/control of the Department of Corrections)
	11. More than one issue or the complaint and relief requested are not consistent on the Request to Staff and grievance.
	12. Not of a sensitive nature. You must follow the standard grievance process including giving the reviewing authority an opportunity to respond. Emergency grievances must be submitted to the reviewing authority. See OP-090124, section IX.A.
	13. Requests for disciplinary action against staff or monetary compensation will not be addressed in the grievance process.
	14. Appeal form not signed/dated.
	15. The ruling of the Administrative Review Authority or Director's Designee is final.
	16. Facility grievance number not listed on the appeal form.
	17. Additional issues submitted in the grievance appeal and not presented in the initial grievance to the reviewing authority for response will not be addressed by this office.
	18. You have failed to follow previous instructions from the reviewing authority or ARA for filing this grievance/appeal and/or properly resubmit. <b>YOU ARE NOW OUT OF TIME.</b>
	19. You did not provide the date that you received the reviewing authority's response on the appeal form.
	20. This grievance is unanswerable as there are no time frames specified for the alleged action(s) to have occurred
	21. You failed to identify your grounds for an appeal by checking one, or both boxes on the appeal form.
	22. Your appeal must be written on the Misconduct/Grievance Appeal form (DOC060125V effective 4/19).
	23. You will be afforded ONE FINAL opportunity to properly resubmit your corrected grievance or appeal which must be received in ARA within ten (10) days of receipt of this form. <b>DO NOT RETURN THIS FORM WITH YOUR CORRECTED APPEAL.</b>
X	24. Other: <b>RE: IMPROPERLY SUBMITTED GRIEVANCE FORM. YOU MUST PROPERLY SUBMIT YOUR GRIEVANCE TO THE REVIEWING AUTHORITY AT JHCC, NOT THE DIRECTOR. SEE OP-090124, SECTION V.I.B.</b>

THIS OFFICE WILL NOT PROCESS INCOMPLETE/INACCURATE/OUTDATED APPEAL FORMS  
NOTE: Abuse of the grievance process as explained in section IX of OP-090124, will result in restrictions being imposed.

I acknowledge receipt of this response: \_\_\_\_\_



OKLAHOMA  
Corrections

PO Box 11400

OKLAHOMA CITY, OKLAHOMA 73136

405-425-2682 (Office)

405-425-2683 (Fax)

<http://doc.ok.gov>

**Exhibit 15 of 11**  
**Plaintiffs Petition 34**

## INMATE/OFFENDER GRIEVANCE

JHCC  
WARDEN'S OFFICEGrievance no. 20-054

MAY 06 2020

Grievance code: 3

RECEIVED

Response due: \_\_\_\_\_

DO NOT WRITE ABOVE THIS LINE

Date 4-28-20Facility or Unit JHCCName William L. Harding  
(Print)Facility Housing Unit D1-117DOC Number 234-134

Date "Request to Staff" response received: \_\_\_\_\_

Have you previously submitted a grievance on this same issue? YES If yes, what date 4-1-20 facility Doc. Dir., grievance # ? You must submit this completed original within 15 days of the receipt of the response to the "Request to Staff". The "Request to Staff" must have been submitted within 7 days of the incident. Do not include/attach anything to this grievance except the "Request to Staff" including the response. You may quote from or make reference to statutes, operations, field, or administrative memoranda, department publications (time sheets, inventory forms, assessments, etc.). You will be permitted only one opportunity to correct any error(s) made in submitting your grievance.

- The nature of your complaint. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per grievance. Use backside of this page only, if necessary. On 3-11, 18-20 I filed a RTS # JHCC-12578  
JHCC 12610 both of the same issue. I was laid off from OCT  
in fact for building a work bench. a claim of raising my  
voice to Anthony Wiechec. Mr Wiechec laid me off for once we  
took 54 one hour from my pay. please refer to above RTS for
- Informal action taken (including dates) to resolve the complaint, as well as the names of those employees from whom you sought an answer to your grievance. None - I informed that there  
is an ongoing investigation by OIG. I was questioned  
by Sherry Mills & Matt Perry
- The action you believe the reviewing authority may lawfully take. To retain job at OCT  
Furniture factory, be paid for all days laid off, paid for work done  
for Anthony Wiechec @ \$50.00 each total of \$350.00 for 7 per - "Solving  
traps? cutting board"

Grievance report sent to (warden/facility head/deputy director/correctional health services administrator):

Reviewed by Authority of JHCC ?Name William L. Harding

Signature of Grievant

Title 4-28-20 2nd time

Date Sent to Reviewing Authority

DOC 090124A (R 4/19)

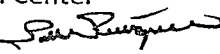
1. Original to file
2. Copy to inmate/offender

Exhibit 1  
Plaintiffs Petition 35



STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF CORRECTIONS  
JOSEPH HARP CORRECTIONAL CENTER

TO: Harding, William DOC 234134  
LOCATION: Joseph Harp Correctional Center  
FROM: Luke Pettigrew, Warden   
DATE: May 11, 2020  
RE: Grievance 20-054

A copy of your original grievance correspondence is being returned unanswered for the following reason(s):

XX	1.	No informal action/Request to Staff response or evidence of submission attached.
	2.	Out of time from date of incident. RTS must be submitted within (7) calendar days of the incident.
	3.	Grievances must be submitted (15) calendar days from the date of the receipt of the response to the Request to Staff
	4.	You are on grievance restriction and/or proper documentation not included.
	5.	Grievances shall not be submitted about matters that are in the course of litigation.
	6.	No person may submit a grievance on behalf of another person.
	7.	Must be legibly written in blue or black ink. No pencil, highlighters or other color of ink is allowed.
	8.	No additional pages or attachments are allowed. Only the front and back of the form may be used.
	9.	Grievances shall not be submitted requesting monetary compensation.
	10.	Grievances shall not be submitted that include requests for disciplinary action against staff.
	11.	Not of a sensitive/emergency nature. Follow the standard grievance process.
	12.	Only one issue or incident allowed per grievance form. You have two (2) different issues stated in the grievance and RTS.
	13.	Grievance not signed/dated or addressed to the appropriate administrator. The "Date sent to Reviewing Authority Was left blank.
	14.	Additional issues submitted in the grievance and not detailed in the initial Request to Staff
	15.	Only the current and correct DOC grievance (OP-090124A- Revised 4/2019) and Request to Staff forms will be accepted
	16.	An issue to which is not grievable by the Oklahoma Department of Corrections.
	17.	This grievance is unanswerable as there are no time frames specified from the alleged action to have occurred.
	18.	Original "Offender Grievance Report Form" was not submitted. A new grievance form will need to be resubmitted.
	19.	You have ten (10) days to resubmit this grievance correctly, if you fail to do so, you will be considered out of time.
XX	19.	Other: Grievance returned unanswered due to matter is currently still pending investigation with OFAI.

Note: All of the information contained herein may be found in OP-090124. It is your responsibility to properly submit your grievance correspondence to the appropriate staff person in accordance with OP-090124.

Inmate Signature \_\_\_\_\_ Date \_\_\_\_\_  
Staff Witness Signature \_\_\_\_\_ Date \_\_\_\_\_



To whom it may concern

I Wade Edwards was called up to talk to the internal affairs at the administration office at JHCC concerning William Harding. I was asked about some things that concerned him at OCT Furniture factory. I was asked about some hobby craft items that MR. Harding was supposed to make for Anthony our informant at the Furniture factory. I never heard any deals being made with me and several others at the donuts that was supposed to be payment for such items.

I was also at the production meeting when our boss really disrespected MR Harding. Anthony really got out of hand the way he approached MR Harding in front of approx. 15 people. We were just told a couple of weeks prior at another meeting if we had a problem on the floor go to the floor boss and that's what MR Harding did.

Our walk out that same after noon the CO at the guard shack informed MR. Harding that he was laid in and would lose a nickle in pay.

Wade Edwards

6-7-2020

To whom it may concern,

I write this statement based upon my presence only in two aspects, and I will in no way speak disparaging remarks about either party involved. It is my opinion that this could have been resolved with a simple conversation, of which I myself feel partially responsible.

First off, my name is Christopher Blount. I have been the Shop Head at the furniture factory for many years. I am not given any authority over other inmates. I am simply responsible for relaying certain expectations on production, and training quality assurance.

An incident occurred in which another offender was suspected of "hobby-craft" and said offender was to be laid in for one week. I told said offender that I had no influence upon this decision, but after multiple other inmates informed me that a different offender had made this "hobby-craft" I explained to the staff that another offender was responsible. I refused to inform them of who this offender was. At this point it was agreed that the original offender in question would not be laid in.

As the Shop Head, I failed in my influence. When the party responsible for "hobby-craft" asked me if they should "confess," I told him "NO-LEAVE IT ALONE." For that, I was wrong, and I believe much of this could have been avoided had I guided with proper judgment. I made that recommendation in error because I felt (my opinion only) that the involved party would be punished regardless. My original primary purpose was to see to it that another

Exhibit 1



Later on we had a sales order discussion in which the issue of the halley craft was broached. Character qualities were challenged, at which point Mr Harding spoke up and took responsibility. Was he visibly upset? Yes. Did he raise his voice? Not in my opinion. He was told they could discuss the issue after the meeting.

These two factors are the ones I was a direct party to, and in day-to-day business was not out of the ordinary. Anything else would be based upon speculation and gossip. I have much respect for both parties involved, and the only negative opinion I have is the fact that both parties have not resolved this through proper communication, of which I also feel responsible.

Christopher J. Blount #216635

Date/Time: 6/10/2020 9:08:38 AM

ODOC

Institution: JHCC

## Offender Statement Report

Offender#	Offender/Group Name	Institution	Unit	Cell/Bed
0234134	HARDING, WILLIAM	JHCC	D	1-117-BOT

## Transaction List

Transaction Date	Transaction Type	Source Document #	Receipt#/Check#	Sender Name	Amount	Account Balance
12/01/2019	BEGINNING BALANCE					\$352.72
12/18/2019	OCI PAY	4242204			\$113.80	\$466.52
12/23/2019	SALES	26			(\$54.84)	\$411.68
12/25/2019	JPAY	0000000109930278		GUERRA, EMILIANO	\$50.00	\$461.68
12/27/2019	DISBURSEMENT	GTL	13585308		(\$20.00)	\$441.68
12/27/2019	DISBURSEMENT FEE				(\$0.55)	\$441.13
01/02/2020	GROUP TRANSFER OUT	234134 HG-13			(\$15.90)	\$425.23
01/06/2020	SALES	10			(\$36.25)	\$388.98
01/13/2020	SALES	15			(\$18.88)	\$370.10
01/24/2020	OCI PAY	JHCC JAN 2020 OCI			\$120.85	\$490.95
01/27/2020	SALES	26			(\$74.43)	\$416.52
02/10/2020	SALES	29			(\$24.93)	\$391.59
02/25/2020	OCI PAY	4242204			\$117.45	\$509.04
03/02/2020	SALES	10			(\$70.52)	\$438.52
03/09/2020	GROUP TRANSFER OUT	234134 PJ-014			(\$23.30)	\$415.22
03/13/2020	HOBBY CRAFT	T-18856/SPEARS	83205		\$136.18	\$551.40
03/13/2020	SALES TAX	T-18856/SPEARS			(\$6.18)	\$545.22
03/13/2020	SURCHARGE	T-18856/SPEARS			(\$30.00)	\$515.22
03/16/2020	SALES	14			(\$49.85)	\$465.37
03/19/2020	OCI PAY	4242204			\$55.96	\$521.33
03/23/2020	DISBURSEMENT	PRIME PRODUCTS USA	13593471		(\$11.50)	\$509.83
03/23/2020	DISBURSEMENT FEE				(\$0.55)	\$509.28
03/26/2020	GROUP TRANSFER OUT	234134 H-009			(\$37.35)	\$471.93
03/26/2020	SALES	42			(\$26.90)	\$445.03
03/30/2020	LEGAL COPAY	JHC 3/17/20 ENV			(\$0.10)	\$444.93
03/30/2020	LEGAL COPAY	JHC 3/17/20			(\$1.60)	\$443.33
04/01/2020	GROUP TRANSFER OUT	234134 PHOTOS			(\$7.50)	\$435.83
04/09/2020	SALES	30			(\$10.31)	\$425.52
04/30/2020	GANG PAY	Not OCT			\$14.45	\$439.97
05/04/2020	LEGAL COPAY	ARA 20-128			(\$2.00)	\$437.97
05/13/2020	SALES	82			(\$8.68)	\$429.29
05/13/2020	LEGAL COPAY	JHC 4/13/20 ENV/NOT			(\$1.10)	\$428.19
05/13/2020	LEGAL COPAY	JHC 4/18/20 ENV/PSTG			(\$1.17)	\$427.02
05/21/2020	OCI PAY	4242204			\$15.00	\$442.02
06/21/2020	LEGAL COPAY	JHC 4/18/20 ENV/PSTG			(\$1.33)	\$440.69
05/21/2020	LEGAL COPAY	JHC 4/22/20 NOTARY			(\$1.00)	\$439.69
05/28/2020	LEGAL COPAY	JHC 4/28/20 PSTG			(\$0.50)	\$439.19
06/02/2020	LEGAL COPAY	JHC 5/6/20 PSTG			(\$0.50)	\$438.69
06/03/2020	SALES	24			(\$8.04)	\$430.65

## Summary Balances

Available Balance	Savings Balance	Debt Encumbrance	Other Encumbrance	Outstanding Instruments	Administrative Holds	Account Balance
\$0.63	\$430.02	\$0.00	\$0.00	\$0.00	\$0.00	\$430.65

This shows money lost from **Exhibit 1**  
**Plaintiffs Petition 40**

Numbers for Paupers Affidavit appear in  
bold below.

	Deposit	Balance
Dec	\$163.80	\$441.13
Jan	\$120.85	\$416.52
Feb	\$117.45	\$509.04
Mar	\$192.14	\$443.33
Apr	\$14.45	\$439.97
May	\$15.00	\$439.19
<b>Avg</b>	<b>\$ 103.95</b>	<b>\$ 448.20</b>
<b>20%</b>	<b>\$ 20.79</b>	<b>\$ 89.64</b>

Months

6

PAYER'S name, street address, city, state, and ZIP code STATE OF OKLAHOMA DEPARTMENT OF CORRECTIONS PO BOX 11400 OKLAHOMA CITY, OK 73136-0400 405-425-2656			OMB No. 1545-0115 <b>2019</b> 1099-MISC		Miscellaneous Income	
PAYER'S Federal Tax ID 736017987	RECIPIENT'S Identification No. XXXXXXXX4771		1 Rents	2 Royalties	3 Other Income \$ 1036.03	4 Fed income tax withheld
RECIPIENT'S Name and Address HARDING WILLIAM 3400 N MARTIN LUTHER KING AVE OKLAHOMA CITY, OK 73111			5 Fishing boat proceeds	6 Med & health care pmts	Copy 2 To be filed with recipient's state income tax return, when required.	
			7 Nonemployee Compensation	8 Pmts in lieu of Div or int		
			9 Payer made direct sales of \$5000 or more of consumer products <input type="checkbox"/>	10 Crop Insurance proceeds		
			11	12		
			13 Excess Golden Par Pmts	14 Gross paid to an attorney		
Account Number 550	15a Sec 409A deferrals	15b Sec 409A income	16 State tax withheld	17 State/Payer's state no.	18 State income	

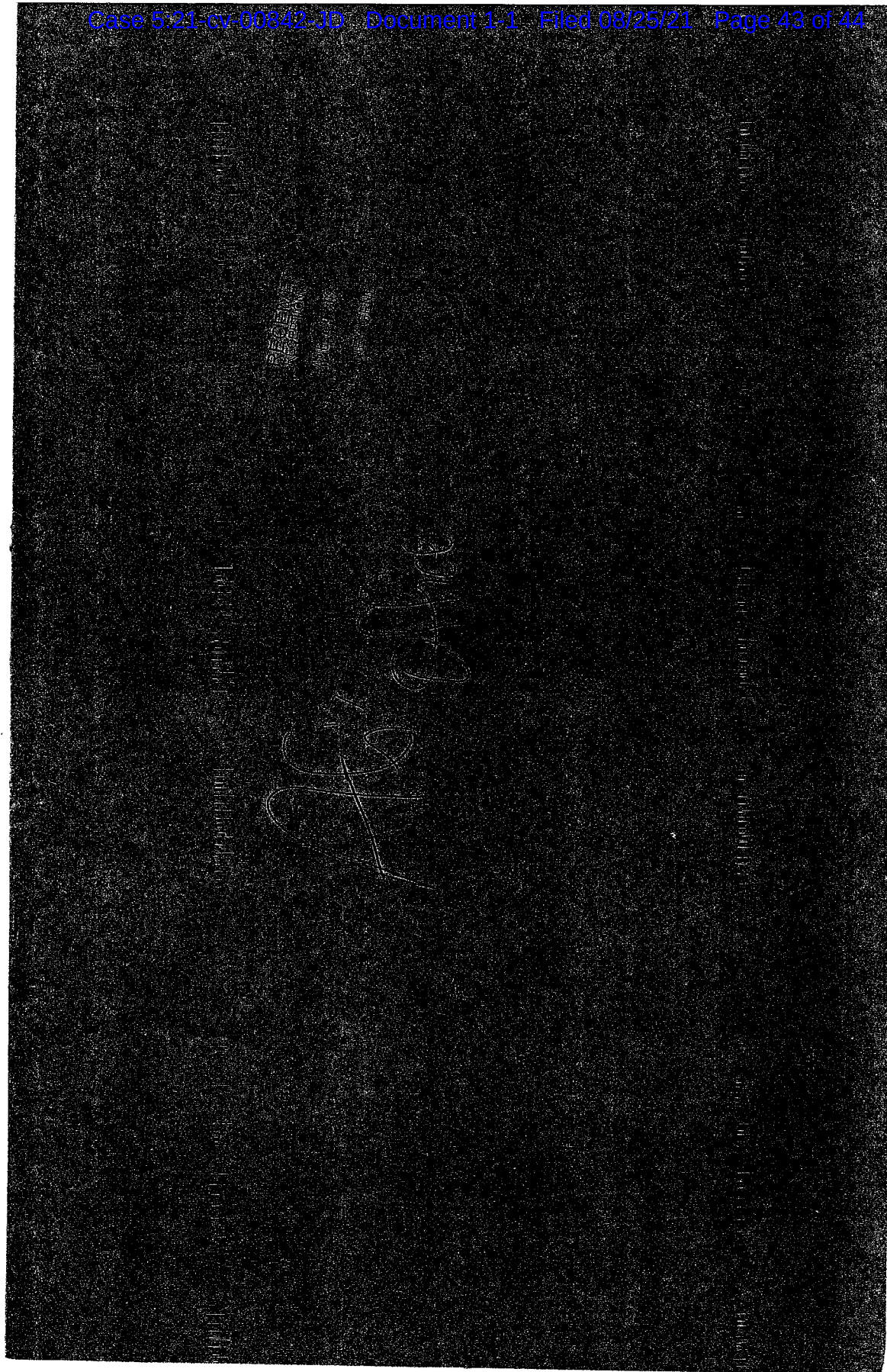
Form 1099-MISC

Department of the Treasury - Internal Revenue Service

STATE OF OKLAHOMA  
DEPARTMENT OF CORRECTIONS  
PO BOX 11400  
OKLAHOMA CITY, OK 73136-0400

Important Tax Return Document Enclosed

HARDING WILLIAM  
3400 N MARTIN LUTHER KING AVE  
OKLAHOMA CITY, OK 73111



Alex Kuntz  
4722 Wynne St  
Guthrie, OK 73044

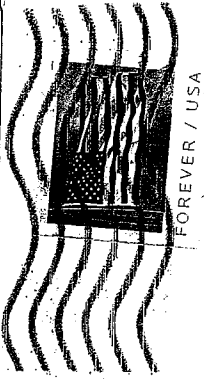
**RECEIVED**

AUG 19 2021

GENERAL COUNSEL

OKLAHOMA CITY OK 730

17 AUG 2021 PM 5 L



Office of the general counsel  
Oklahoma Dept of COM.  
3400 Martin Luther King Ave  
OKLAHOMA CITY, OKLAHOMA

73111-429899



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